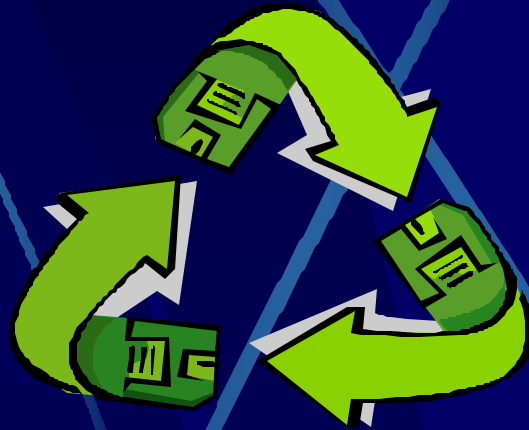


OceanAir Environmental



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Emission Offset Requirements





NSR Rules



- Nox
- VOC
- PM10
- CO (SCAQMD
CO non-
attainment region)
- ERC's must comply with
USEPA Emission Trading
policy
- Real, Surplus,
Quantifiable, Permanent,
and Enforceable
- Result in Net Air quality
benefit
- Limited flexibility with air
districts

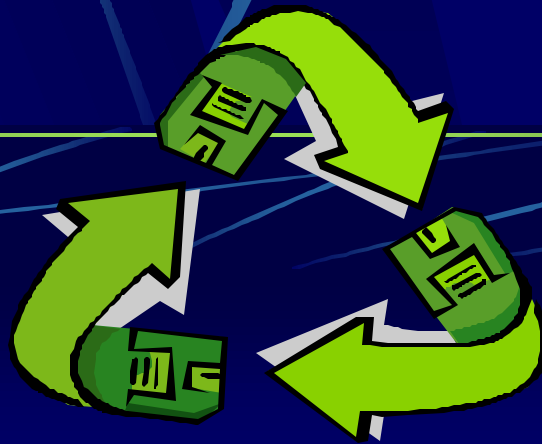
CEQA Mitigation

- CEQA Mitigation is not NSR Erc's
- Flexibility exists in innovative programs
- Within control of CEC



CEQA

Innovative NSR ERC's



Current

- San Diego Marine Vessels
- Waste Management CNG Trucks
- Road Paving Projects
- Inter Pollutant Offsets
- Agriculture burn ERC's
- Averaging among quarters
- Inter-Basin offsets
- Inter-Pollutant Offsets

Future

- Agriculture Internal Combustion Engines
- Cold Ironing
- SCR/ScoNOx for boilers
- MSRC (Competition with Government)

NOX

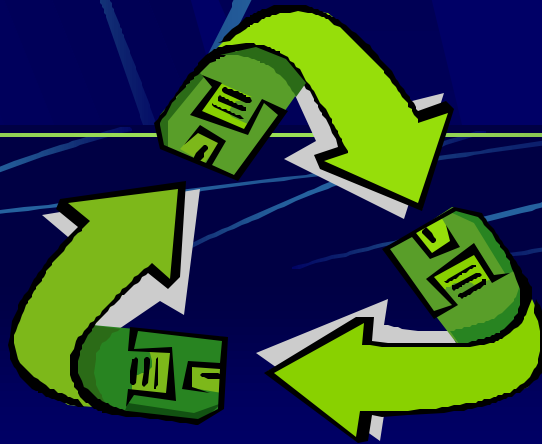
CEQA

- Inconsistent policy with CEC
- Requiring NSR grade offsets vs. other options (CARB guidelines 1:1 interpollutant offsets. Paying into Carl Moyer/AB2766 Funds





Recommendations



NSR

- Support air district recommendations for offset types and location
- Support innovative ways to create new offsets



CEQA

- Adopt consistent policy giving applicant either of the two options:
- Provide direct or interpollutant offsets at 1:1 ratio
- Be flexible on inter-basin transfer
- Allow applicant an option to pay into air district or CEC funds at a fixed dollar/ton based on a \$10,000/ton fixed
- Allow a more global perspective, I.e. reproduction in air toxics plus some PM10 in lieu of PM10